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Attorneys for Defendant **LOCKHEED MARTIN CORPORATION**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

Bahman M. Ghani

Plaintiff,

vs.

**LOCKHEED MARTIN CORPORATION,**  
and DOES 1 through 20, inclusive

Defendants.

**NO. 5:08-cv-02120 JF**

**RULE 26(f) REPORT**

**DATE:** August 15, 2008  
**TIME:** 10:30 AM  
**CTRM:** 3, 5<sup>th</sup> Floor  
**JUDGE:** Hon. Jeremy Fogel

The attorneys for the parties in the above-captioned matter met and conferred in good faith on July 9, 2008, and wish to report the following:

1 A. The parties have made those disclosures as required under Rule 26(a),  
2 including not only identification of documents but production of those  
3 documents identified;

4 B. The parties have further agreed that discovery will be conducted upon the  
5 following discrete subjects:

- 6 1. Facts and documents regarding plaintiff's employment status,  
7 whether at-will or otherwise;
- 8 2. Facts and documents concerning the events and reasons leading  
9 to the termination of plaintiff's employment;
- 10 3. Post-termination communications between Lockheed and other  
11 third party employers concerning the termination of Ghani's  
12 employment as well as Ghani's efforts to secure employment;
- 13 4. Ghani's damages, if any.

14 No discovery has gone forward to date. The parties, however, have agreed upon the  
15 the following discovery plan and schedule:

16 The parties estimate neither the number of depositions nor time required for each  
17 deposition will exceed those time limits as set forth in Federal Rules of Civil Procedure, Rule  
18 30. In addition, each party intends to serve two sets of interrogatories, each not to exceed  
19 twenty five questions in length as provided by Federal Rules of Civil Procedure, Rule 33, two  
20 sets of requests for documents, and one set of request for admissions. In addition,  
21 documents will be subpoenaed from third parties as the need arises. The parties do not  
22 request at this time any changes with regard to the limitations on discovery imposed by the  
23 federal rules of civil procedure nor by local rules, except as to the number of interrogatories  
24 that may be served.

25 Stipulated protective orders may be sought under Rule 26(c) for confidential financial  
26 and/or proprietary information, as the need arises, but none are requested at this time.  
27  
28

1 Finally, the parties believe fact discovery can be completed by April, 2009, with expert  
2 witness discovery to be completed by June, 2009.

3  
4 DATED: 7/14/08  
5



**M. JEAN STARCEVICH**, Attorney for  
Plaintiff **BAHMAN M. GHANI**

6  
7 DATED: 7/16/08  
8



**MICHAEL W. FOSTER**, Attorney for  
Defendant **LOCKHEED MARTIN**  
**CORPORATION**